

# United States District Court

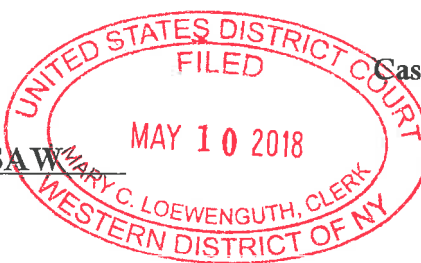
for the  
Western District of New York

United States of America

v.

CHRISTINE WRIGHT-DARRISAW

*Defendants*



Case No. 18 MJ 578

## CRIMINAL COMPLAINT

I, SHANE MARSHALL, Deputy United States Marshal for the Western District of New York, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about December 15, 2017, in the Western District of New York, the defendant **CHRISTINE WRIGHT-DARRISAW** violated 18 U.S.C. § 115(a)(1)(B), an offense described as follows:

the defendant made direct verbal threats to kill United States District Judge Frank Geraci, who is the Chief Judge for the Western District of New York, with intent to impede, intimidate and interfere with Judge Geraci while engaged in the performance of official duties, and with intent to retaliate against Judge Geraci on account of the performance of official duties, in violation of Title 18, United States Code, Section 115 (a)(1)(B).

**SEE ATTACHED AFFIDAVIT OF SHANE MARSHALL, DEPUTY UNITED STATES MARSHAL, UNITED STATES MARSHAL SERVICE, WESTERN DISTRICT OF NEW YORK.**

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

*Shane Marshall*  
*Complainant's signature*

SHANE MARSHALL, Deputy U.S. Marshal  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: May 10, 2018

*Brenda K. Sannes*  
*Judge's signature*

City and State: Rochester, New York

Brenda K. Sannes, United States District Judge  
*Printed name and title*

## AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK     )  
COUNTY OF MONROE    ) SS:  
CITY OF ROCHESTER     )

**SHANE MARSHALL, being duly sworn, deposes and states:**

1. I have been employed with the United States Marshals Service (USMS) for 15 years. I currently hold the position of Protective Intelligence Investigator within the USMS, responsible for investigating and appropriately mitigating all threats and inappropriate communications toward the federal judiciary, its respective court officers, and the U.S. Attorney's Office in and for the Western District of New York.

2. As part of my current duties, I have become involved in an investigation of a violation of Title 18, United States Code, Section 115(a)(1)(B) (Influencing, Impeding or Retaliating Against a Federal Official).

3. I make this affidavit in support of the annexed criminal complaint charging CHRISTINE WRIGHT-DARRISAW, with a violation of Title 18, United States Code, Section 115(a)(1)(B), regarding threats made to kill a member of the United States District Court, with the intent to impede, intimidate, or interfere with such court officials.

4. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only facts that I believe are necessary to establish probable cause to demonstrate that CHRISTINE WRIGHT-DARRISAW has violated Tide 18, United States Code, Section 115(a)(1)(B).

5. The Kenneth B. Keating Federal Building ("Federal Building") is located in Rochester, within the Western District of New York. The building houses numerous government

offices including those of the Executive, Legislative, and Judicial Branch of the United States Government. The building also houses a Federal Courthouse. United States District Court Judge Frank Geraci maintains his judicial chambers within the Courthouse side of the Keating Federal Building. Judge Geraci is currently Chief Judge for the Western District of New York.

6. In his official capacity, Judge Geraci is presiding over United States vs. Christine Wright-Darrisaw, WDNY Case Number 12-CR-6117, in which the defendant was convicted of threatening to kill President Barack Obama. Judge Geraci presided over the defendant's jury trial, sentencing, and multiple appearances related to Supervised Release violations. The case is still active before the Court.

7. On December 15, 2017, Judge Geraci's chambers received two phone calls from 585-XXX-5270. This number is attributable via multiple sources to defendant Wright-Darrisaw. The number displayed on the caller ID as Wright, Chistine (missing "R"). Additionally, in both phone calls the caller identified herself as Christine Wright. Further, Judge Geraci and his staff are familiar with Wright-Darrisaw and her voice based on the litigation history of her case.

8. The first call came in at approximately 11:25 and was answered by one of the Judges law clerks known to your affiant and identified herein as Clerk-1. Clerk-1 is a law clerk employed by Judge Geraci at the Federal Court house in Rochester, New York and was working in their official capacity in the Judge's chambers at the time of the call. The caller started by identifying herself as Christine Wright. The caller was described as speaking quickly, clearly, and changed subjects rapidly.

9. There came a point in the conversation where Clerk-1 was able to ask the caller questions about her case. The caller became frustrated and said, "I am calling in a death threat against

the Judge." There was a short pause and the caller stated PO Bedette<sup>1</sup> and Jeff Ciccone<sup>2</sup> threatened death against the Judge. Wright-Darrisaw then hung up the phone.

10. On December 15, 2017 at approximately 12:01, the defendant again called Judge Geraci's Chambers. This call also came from the same number, 585-XXX-5270. The call was answered by another one of the Judges law clerks known to your affiant and identified herein as Clerk-2. Clerk-2 was working in their official capacity at the time of the call. The caller started by again identifying herself as Christine Wright. The caller was described as speaking quickly, clearly, and changed subjects rapidly. Among other topics, Wright-Darrisaw was complaining to Clerk-2 about her supervising "parole" officer.

11. At a point during the call, Clerk-2 was able to interject and ask who the caller's officer was. This angered Wright-Darrisaw who then stated she was no longer on parole and she was referring to her former parole officer. Wright-Darrisaw went on to say because no one listens, her and her boyfriend decided to "call in a terrorist threat." Clerk-2 was surprised by this statement and did not say anything which caused a short pause. Wright-Darrisaw then clearly stated "This is a death threat."

12. Both Clerk-1 and Clerk-2 believed the calls to contain true threats and immediately reported the threats to the Court. The threats were then reported to the United States Marshal's Office. Your affiant was notified and immediately instituted protective measures and began an investigation.

13. Clerk-1 was interviewed as part of the threat investigation. Clerk-1 believed the phone call was a direct threat from Christine Wright directed toward Judge Geraci. Clerk-1 was so concerned that they immediately notified Judge Geraci who then notified the USMS.


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<sup>1</sup> The defendant is currently on Supervised Release with the United States Probation Office. Her supervising probation officer is Jeremy Bedette.

<sup>2</sup> At the time of the call, the defendant's defense attorney was Assistant Federal Defender Jeffrey Ciccone.

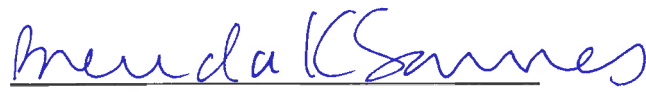
14. Clerk-2 was interviewed as part of the threat investigation. Clerk-2 was asked if it was possible the caller had placed the call in an attempt to warn Judge Geraci of an impending attack by someone else. Clerk-2 said absolutely not. Due to the overall tone and hostility of the caller, along with the caller stating that her and her boyfriend had made the "decision" to call in a terrorist threat, there was no doubt in Clerk-2's mind that the call was a direct threat from Christine Wright directed toward Judge Geraci.

Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that CHRISTINE WRIGHT-DARRISAW has violated Title 18, United States Code, Section 115(a)(1)(B) in that the defendant made direct verbal threats to kill United States District Judge Frank Geraci, who is the Chief Judge for the Western District of New York, with intent to impede, intimidate and interfere with Judge Geraci while engaged in the performance of official duties, and with intent to retaliate against Judge Geraci on account of the performance of official duties.

  
SHANE MARSHALL  
Deputy United States Marshal  
United States Marshal Service  
Western District of New York

Subscribed to and sworn before me

this 10 day of May, 2018.

  
BRENDA K. SANNES  
United States District Judge  
Northern District of New York